



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

June 13, 2022

APPLICATION GRANTED

SO ORDERED *New York*

VERNON S. BRODERICK

U.S.D.J. 06/14/22

BY ECF

The Honorable Vernon S. Broderick
United States District Court Judge
Southern District of New York
40 Foley Square
New York, New York 10007

The time between June 13, 2022 and August 15, 2022 is hereby excluded under the Speedy Trial Act, 18 U.S.C. 3161(h)(7)(A), in the interest of justice. This time is necessary because defense counsel is unavailable to begin trial until late February 2023, and to allow the defense to continue their review of discovery and preparation for trial.

Re: *United States v. Luis Lluberes et al.*, 20 Cr. 493 (VSB)

Dear Judge Broderick:

The Government respectfully writes to request an exclusion of time in the interests of justice from Speedy Trial Act calculations. On April 29, 2022, the Court excluded time from Speedy Trial Act calculations through June 13, 2022. On May 13, 2022, the Government filed a letter in which it noted that, while the Government is trial ready, defense counsel have numerous trial conflicts until February 2023, and requested a firm trial date for late February 2023. In light of counsels' unavailability and their continued review of discovery and preparation for trial, the Government requests that time be prospectively excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), until a control date of August 15, 2022. None of the defendants has voiced an objection to the Government's request and counsel for Maria Aguilar, a/k/a "Maria Hewitt" and Maria Lopez have consented.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

By: /s/
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cc: all counsel of record (by ECF)